

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Ishaaq Mickens,
Debtor.

Case No. 22-13031-amc
Chapter 13

Debtor's Motion to Modify Chapter 13 Plan

AND NOW, Debtor Ishaq Mickens, by and through his attorney, moves this Court for approval of a modified chapter 13 plan. In support of this motion, the Debtor states as follows:

1. The Debtor hereby requests that the Third Amended Chapter 13 Plan filed as ECF No. 47 be approved by the court and adopted as the confirmed chapter 13 plan.
2. The proposed plan: (i) adjusts payment on the amended priority claim of the Internal Revenue Service, and (ii) provides for payment of attorney fees to the Debtor's counsel for post-confirmation services.

NOW, THEREFORE, the Debtor asks this Court to approve the modified plan and to grant such other relief in his favor as may be necessary and proper under the law.

Date: March 12, 2024

CIBIK LAW, P.C.
Counsel for Debtor

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